

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

|                                   |                                 |
|-----------------------------------|---------------------------------|
| In re:                            | ) Chapter 11                    |
|                                   | )                               |
| W.R. GRACE & CO., <u>et al.</u> , | ) Case No. 01-1139 (JKF)        |
|                                   | ) Jointly Administered          |
| Debtors.                          | ) Re: Docket Nos. 8640 and 9106 |

**DEBTORS' MOTION FOR LEAVE TO FILE A REPLY IN SUPPORT OF THEIR  
TWELFTH OMNIBUS OBJECTION TO CERTAIN UNAUTHORIZED CLAIMS FILED  
BY THE LAW FIRM OF SPEIGHTS & RUNYAN**

The Debtors hereby request authority pursuant to Del Bankr. L.R. 9006-1(d) to file a reply in further support of the Debtors' Twelfth Omnibus Objection to Certain Claims Filed by the Law Firm of Speights & Runyan (Docket No. 8640) (the "12<sup>th</sup> Omnibus Objection"), which is currently scheduled for hearing before this Court on August 29, 2005 at 12:00 p.m.

The Speights & Runyan firm ("Speights") has signed and filed claims on behalf of claimants it does not represent; has attempted to withdraw claims on behalf of claimants it does not represent; has attempted to withdraw nonexistent claims on behalf of phantom claimants that never had proofs of claim on file in these bankruptcy cases; and has violated Bankruptcy Rule 3006 by attempting to withdraw objected-to claims without Court order or a hearing.

On July 28, 2005, Speights filed a Response to the 12<sup>th</sup> Omnibus Objection (Docket No. 9106) (the "Response"). In its Response, Speights, among other things, represented to this Court that it is acting as class counsel for a class that does not exist. The Debtors seek leave to file a reply that provides the Court with the appropriate factual information necessary to understand the representations made by Speights in its Response and further bases for the Debtors' 12<sup>th</sup> Omnibus Objection.

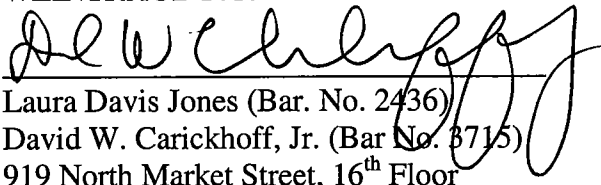
WHEREFORE, the Debtors respectfully request entry of an Order granting them authority to file the reply, which is attached hereto as Exhibit 1.

Dated: August 19, 2005

KIRKLAND & ELLIS LLP  
David M. Bernick, P.C.  
Michelle H. Browdy  
Janet S. Baer  
200 East Randolph Drive  
Chicago, Illinois 60601  
Telephone: 312/861-2000  
Facsimile: 312/861-2200

and

PACHULSKI, STANG, ZIEHL, YOUNG, JONES &  
WEINTRAUB P.C.

  
\_\_\_\_\_  
Laura Davis Jones (Bar. No. 2436)  
David W. Carickhoff, Jr. (Bar No. 3715)  
919 North Market Street, 16<sup>th</sup> Floor  
P.O. Box 8705  
Wilmington, Delaware 19899-8705 (Courier 198901)  
Telephone: 302/652-4100  
Facsimile: 302/652-4400

Co-Counsel for the Debtors and Debtors in Possession

SO ORDERED this \_\_\_\_ day  
of August, 2005

\_\_\_\_\_  
The Honorable Judith K. Fitzgerald  
United States Bankruptcy Judge